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COMMENTS:

#### IN ERVIEW AGENDA

#### DISCUSS FEATURES THAT APPEAR TO HAVE NOT BEEN CONSIDERED

Claim 1, for example, recites "a client connected ... to said server and retrieves together, based on the management information ... both the document in the upper layer and the document in the lower layer". The rejection does not appear to address this feature. The rejection's analysis of claim 1 at page 4, and in particular line 11, compares Serbinis to "client ... and retrieves, based on the management information ...". The rejection does not appear to discuss where Serbinis or any other prior art reference discloses retrieving two documents together based on management information that defines the hierarchy to which the retrieved-together documents belong.

DISCUSS WHY USDIN DOES NOT DISCLOSE AN XML FILE DEFINING THE HIE RARCHICAL STRUCTURE BY INDICATING A RELATION BETWEEN A DOCUMENT IN THE UPPER LAYER AND A DOCUMENT IN THE LOWER LAYER

The rejection cites Usdin as teaching "an XML file defining the hierarchical structure by indigating relation between a document in the upper layer and a document in the lower layer ... a document type definition file [etc.]". More specifically, the rejection compares this feature to the fact that "XML assumes that data are hierarchical a structured... which consist of name 'root' element which begins at the beginning of the document... the hierarchical structure is fairly obvidus in text documents... A section starts... the same level... a section... subsections; page 126" The comparison appears to be incorrect because Usdin only teaches hierarchical structure within a document. In contrast, claim 1 has an XML file which defines a hierarchy of different distinct documents. Hierarchical structuring of XML elements within a document (Sertanis) is not the same as defining a hierarchy of documents using a different XML file. In other words, the hierarchical structure in claim 1 is a hierarchy of the recited documents (a hierarchy described in Usdin is only a hierarchy of XML Blements within a single document (XML-tagged sections, subsections, etc.), where the hieranthy starts at a root XML element in the document. It is well known that an XML root element is contained within one file and has within it other XML elements according to XML definition file (e.g. schema, DDT) that defines legitimate elements.

Furthermore, as discussed above, both cited references are silent about using the XML file defining the hierarchy to retrieve together (for a client) two documents in the hierarchy.

The addition of Usdin is based on the incomplete consideration of the hierarchy defining role of the XML file recited in the claims. Based on the explanation of the XML file discussed above, modifying Serbinis with Usdin to have Serbinis store XML-structured documents as its managed documents does not meet the recited features of the present claims.

## DISCUSS DISTINCTIVENESS OF CLAIMS AS A WHOLE

The rejection appears to incorrectly compare the present XML file to an ordinary single XML-structured document (having a root element and its child elements) because the claims have not been examined as a whole. According to MPEP § 2141.01, the claimed invention must be considered as a whole, and according to § 2141.02, obviousness is a question of "whether the claimed invention as a whole would have been obvious." Finally, MPEP § 2144.08 states that "[o]ffice personnel should first analyze the claims as a whole ... the claimed invention may not be dissected into discrete elements to be analyzed in isolation, but must be considered as a whole..."

The present claims recite a feature of an XML file that defines a hierarchy of documents. The current rejection compares the present XML file's defined hierarchy to the hierarchy of elements in a single XML file. However, if the present XML file is considered in relation to the whole of, for example, claim 1, then it can be seen that as a whole the XML file is also characterized by defining a hierarchy of documents that are in a document database by indicating a relation between documents in different layers in the hierarchy, and the XML file is used as a basis for retrieving together documents in the hierarchy. Usdin and Serbinis, either individually or in combined, do not disclose the features found in the claims as a whole.

#### PENDING CLAIMS

styl of each document;

1. (Previously Amended) An integrated document management system comprising: a storage unit which stores therein a document database comprising a plurality of documents having together a hierarchical structure comprising an upper layer and a lower layer, where the structure is defined with hypertext described in an extensible markup language (XML); a management information database comprising management information comprising an XML file defining the hierarchical structure by indicating a relation between a document in the upper layer and a document in the lower layer, a document type definition file describing information on a version number of each document, and a document style sheet file defining a

a server connected to said storage unit and provided with a manager of the documents;

a client connected via a network to said server and retrieves together, based on the management information, by accessing said server, both the document in the upper layer and the focument in the lower layer each having a specified version number, from the document data base.

- 2. (Previously Amended) The integrated document management system according to C aim 1, wherein the management information includes information indicating a collection of a plurality of documents in a same layer and each version number of the plurality of documents, and said client retrieves, based on the management information, by accessing from said server the collection of the plurality of documents in the same layer, the documents retrieved each having a specified version number, from the document database.
- 3. (Previously Amended) The integrated document management system according to Claim 1, wherein said server registers, when a document registered in the document database is updated, the updated document in the document database, and also updates the version number information in the management information related to the document.

- 4. (Previously Amended) The integrated document management system according to Claim 3, wherein said client sends via the network to said server retrieval information for a document that has been retrieved, and said server sends via the network to said client, when a document corresponding to the retrieval information is updated, updating information related to the document updated.
- 5. (Previously Amended) The integrated document management system according to Claim 1, wherein the management information includes information related to a security level corresponding to each of the plurality of documents and said server permits or inhibits retrieval of the document according to the security level.
- 6. (Previously Amended) A document retrieval device used in an integrated document management system having

a storage unit which stores therein a document database comprising a plurality of documents having together a hierarchical structure comprising an upper layer and a lower layer, where the structure is defined with hypertext described in an extensible markup language (XML);

a management information database comprising management information comprising an XML file defining the hierarchical structure by indicating a relation between a document in the upper layer and a document in the lower layer, a document type definition file describing information on a version number of each document, and a document style sheet file defining a style of each document; and

a server connected to said storage unit and provided with a manager of the documents, wherein

said document retrieval device retrieves together, based on the management information, both the document in the upper layer and the document in the lower layer in a specified version number from the document database.

- 7. (Previously Amended) The document retrieving device according to Claim 6; wherein the management information includes information indicating a collection of a plurality of documents in a same layer and a version number of each of the plurality of documents, and a plurality of documents on the same layer in a specified version number are retrieved from the document database based on the management information, by accessing from said server the collection of the plurality of documents.
- 8. (Previously Amended) The document retrieval device according to Claim 6, wherein the management information includes information related to a security level corresponding to each of the plurality of documents, and the documents are retrieved from the document database according to a permission of retrieval corresponding to the security level.
- 9. (Previously Amended) A computer-readable recording medium with a document retrieval program recorded therein, the document retrieval program used in an integrated document management system having,
- a storage unit which stores therein a document database comprising a plurality of documents having together a hierarchical structure comprising an upper layer and a lower layer, where the structure is defined with hypertext described in an extensible markup language (XML); and
- a management information database comprising information comprising an XML file defining the hierarchical structure by indicating a relation between a document in the upper layer and a document in the lower layer, a document type definition file describing information on a version number of each document, and a document style sheet file defining a style of each document; and
- a server connected to the storage unit and provided with a manager of the documents, wherein
- the document retrieval program used for making a computer access said server via a network to thereby retrieve together, based on the management information, both the document in the upper layer and the document in the lower layer in a specified version number, from the document database.

- 10. (Previously Amended) The computer-readable recording medium with a document retrieval program recorded therein according to Claim 9; wherein the management information includes information indicating a collection of a plurality of documents in a same layer and a version number of each of the plurality of documents, and in the step described above, a plurality of documents on the same layer in a specified version number are retrieved from the document database according to the management information by accessing said server.
- 11. (Previously Amended) The computer-readable recording medium with a document retrieval program recorded therein according to Claim 9, wherein the management information includes information related to a security level corresponding to each of the plurality of documents, and in the step described above, the documents are retrieved from the document database according to a permission of retrieval corresponding to the security level.
- 12. (Withdrawn) A document retrieval method used in an integrated document management system for managing documents, the method comprising:

including extensible markup language code in a master document and component documents of the master document, where the extensible code complies with a document structure definition and where the extensible code hierarchically relates the master document and is component documents;

allowing a document retrieval program accessing the integrated document management system to retrieve component documents while continuing to manage the master document as a hieralchical document accessible by other document retrieval programs.